

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

INDIANA PUBLIC RETIREMENT SYSTEM,)	Civil Action No. 3:19-cv-00407
Individually and on Behalf of All Others )	
Similarly Situated, )	
	<u>CLASS ACTION</u>
Plaintiff, )	Judge Eli J. Richardson
	Magistrate Judge Alistair E. Newbern
vs. )	
	NOTICE OF MOTION AND MOTION FOR
MICHAEL T. CARTWRIGHT, KIRK R. )	(1) FINAL APPROVAL OF CLASS ACTION
MANZ and ANDREW W. McWILLIAMS, )	SETTLEMENT AND APPROVAL OF PLAN
	OF ALLOCATION; AND (2) AN AWARD
Defendants. )	OF ATTORNEYS' FEES AND EXPENSES
	AND AN AWARD TO PLAINTIFF
	PURSUANT TO 15 U.S.C. §78u-4(a)(4)

TO: ALL PARTIES AND THEIR COUNSEL ON RECORD

PLEASE TAKE NOTICE that, pursuant to an Order of the Court entered July 6, 2023, on October 18, 2023, at 3:00 p.m., or as soon thereafter as counsel may be heard, at the Fred D. Thompson U.S. Courthouse and Federal Building, Courtroom 5C, 719 Church Street, Nashville, Tennessee, before the Honorable Eli Richardson, Plaintiff will and hereby moves for: (i) final approval of the proposed settlement of the above-captioned action; and (ii) approval of the Plan of Allocation. In addition, Class Counsel hereby apply for an award of attorneys' fees and expenses and an award to Plaintiff pursuant to 15 U.S.C. §78u-4(a)(4).

The foregoing motions are based on the:

- Memorandum of Law in Support of Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation;
- Memorandum of Law in Support of Class Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4);

- Declaration of Christopher M. Wood in Support of: (1) Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) an Award of Attorneys' Fees and Expenses and an Award to Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4);
- Declaration of Jeffrey Gill;
- Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date;
- Declaration of Christopher M. Wood Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Jerry Martin Filed on Behalf of Barrett Johnston Martin & Garrison, PLLC in Support of Application for Award of Attorneys' Fees and Expenses; and
- Stipulation of Settlement and all Exhibits thereto, all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

DATED: September 13, 2023

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
CHRISTOPHER M. WOOD, #032977  
CHRISTOPHER H. LYONS, #034853  
HENRY S. BATOR, #040431

s/ Christopher M. Wood  
\_\_\_\_\_  
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Local Counsel

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 13, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

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# Mailing Information for a Case 3:19-cv-00407 Caudle v. AAC Holdings, Inc. et al

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## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)